

# SOUTHERN ENVIRONMENTAL LAW CENTER

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June 18, 2020

**Via Electronic Filing**

C. Jo Anne Wessinger Hill  
Legal Counsel to the Commission  
Public Service Commission of South Carolina  
101 Executive Center Drive, Suite 100  
Columbia, South Carolina 29210

**In Re: Application of Dominion Energy South Carolina, Incorporated for Adjustment of Rates and Charges, Docket No. 2020-125-E; see also Docket Nos. 2020-106-A; 2017-370-E; 2017-305-E; and 2017-207-E**

Dear Ms. Wessinger Hill,

The Southern Environmental Law Center ("SELC") submits this letter in response to your email dated June 5, 2020 requesting comments on a procedural schedule for the next Dominion Energy South Carolina ("DESC") rate case. SELC anticipates representing nonprofit organizations in this proceeding, including the South Carolina Coastal Conservation League ("CCL").

As an initial matter, we are concerned that the abbreviated timeline for this proceeding and the 20-day deadline for discovery responses (as established under S.C. Code Regs. 103-833) will not allow sufficient time for parties to conduct a robust discovery process and prepare for filing of direct or surrebuttal testimony. We request that the Commission, for the purposes of this proceeding, establish an abbreviated 10-day deadline for parties to respond to written interrogatories and requests for production.


Assuming that DESC files its rate case application on August 14, 2020, we propose that the Commission adopt the following schedule:

1. DESC must prefile its direct testimony and exhibits on or before **August 28, 2020**.
2. Other parties of record and ORS must prefile direct testimony and exhibits on or before **November 10, 2020**.
3. DESC must prefile its rebuttal testimony and exhibits on or before **November 30, 2020**.
4. Parties must submit all discovery requests on or before **December 1, 2020**.
5. Other parties of record and ORS must prefile any surrebuttal testimony and exhibits on or before **December 15, 2020**.

We believe the above schedule will allow the greatest fairness to all parties given the abbreviated schedule in this proceeding.

Lastly, we recommend that the Commission require that DESC update its test period results for the historical test period (January 1, 2019 thru December 31, 2019) for known and measurable changes as of September 30, 2020.

Respectfully,



Kate Lee

STATE OF SOUTH CAROLINA  
BEFORE THE PUBLIC SERVICE COMMISSION  
DOCKET NO. 2020-125-E

In the Matter of: )

Application of Dominion Energy )

South Carolina, Incorporated for )

Adjustment of Rates and )

Charges (See Commission Order No. )

2020-313) )

CERTIFICATE OF SERVICE

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I certify that the following persons have been served with one (1) copy of the Southern Environmental Law Center's Comments on Procedural Schedule for DESC Rate Case 2020-125 by electronic mail and/or U.S. First Class Mail at the addresses set forth below:

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June 18<sup>th</sup>, 2020

/s/ Emily E. Selden